

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

J.B. INTERNATIONAL, LLC
d/b/a J. BIRNBACH

Plaintiff,

V.

WILLIAM NOBLE RARE JEWELS, L.P.
and WILLIAM NOBLE,

Defendants.

Civil Action No. 3:22-cv-01422

MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, J.B. International, LLC d/b/a J. Birnbach (“J.B. International”), by and through its undersigned counsel, for its Motion for Summary Judgment as to Counts I (“Breach of Letter Agreement”) and Count II (“Breach of January Memorandum”) of the Second Amended Complaint rely upon the facts and law stated in the Brief in Support of Motion for Summary Judgment.

Summary

In accordance with L.R. 56.3(a)(1), J.B. International states that both Count I and II of the Complaint are breach of contract claims. The elements of the claims are (1) the existence of a valid contract; (2) the plaintiff performed or tendered performance as the contract required; (3) the defendant breached the contract by failing to perform or tender performance as the contract required; and (4) the plaintiff sustained damages as a result of the breach.

Dated: August 21, 2023

Respectfully Submitted,

KAMINSKI LAW, PLLC

/s/ Shanna M. Kaminski

Shanna M. Kaminski

MI Bar No. P74013

P.O. Box 247

Grass Lake, Michigan 49240

(248) 462-7111 - Telephone

skaminski@kaminskilawpllc.com

Counsel for Plaintiff

-and-

PADFIELD & STOUT, L.L.P.

420 Throckmorton Street, Suite 1210

Fort Worth, Texas 76102

(817) 338-1616 - Telephone

(817) 338-1610 - Facsimile

/s/ Brandon J. Gibbons

Mark W. Stout

State Bar I.D. #24008096

mstout@padfieldstout.com

Brandon J. Gibbons

State Bar I.D. #24082516

bgibbons@padfieldstout.com

Local Counsel for Plaintiff

Certificate of Service

The undersigned hereby certifies a true and correct copy of the foregoing was electronically served on all counsel of record via the Court's ECF system on August 21, 2023.

/s/ Brandon J. Gibbons

Brandon J. Gibbons